

REMARKS

This Amendment is being filed in response to the Final Office Action mailed December 8, 2008, which has been reviewed and carefully considered. Entry of the present amendment and allowance of the present application in view of the amendments made above and the remarks to follow are respectfully requested.

Claims 1-13 remain in this application, where claim 13 had been previously added. Claims 1, 11, 12 and 13 are independent.

By means of the present amendment, the specification has been amended to correct a typographical error.

In the Final Office Action, the specification and claim 11 are objected to, and claim 12 is rejected under 35 U.S.C. §101. These objections and rejection are traversed. However, without agreeing with the position forwarded in the Final Office Action and in the interest of advancing prosecution, claims 11 and 12 have been amended for better clarity and conformance with the specification. It is respectfully submitted that the objection to the

specification and claim 11, and this rejection of claim 12 have been overcome. Accordingly, withdrawal of these objections and rejection is respectfully requested.

In the Final Office Action, claims 1-4, 7 and 9-13 are rejected under 35 U.S.C. §103(a) over U.S. Patent No. 7,206,787 (Corston-Oliver) in view of WO 01/97070 (Chakravarty) and U.S. Patent No. 5,337,191 (Austin). Claims 5-6 and 8 are rejected under 35 U.S.C. §103(a) over Corston-Oliver in view of Chakravarty and U.S. Patent Publication No. 2005/0203970 (McKeown). Applicant respectfully traverses and submits that claims 1-13 are patentable over Corston-Oliver, Chakravarty and McKeown for at least the following reasons.

On page 4 of the Final Office Action, it is correctly noted that Corston-Oliver does not disclose or suggest assigning or "selecting a type of linkage from a number of predefined types of linkages, a type of linkage being selected that corresponds to the type of content-based relation between the input document (D1) and the reference data (D2)," as recited in amended independent claim 1, and similarly recited in amended independent claims 11, 12 and

13. Chakravarty is cited in an attempt to remedy the deficiencies in Corston-Oliver.

Chakravarty is directed to a method and system for digital asset link management. As specifically recited in the Abstract, a "link type (113) is obtained from the link types file." (Emphasis added) Page 4, line 21, further, specifically recite that "[b]y reference to the link types [file] 103, one can determine the type of link between the two values."

In addition, page 5, lines 2-3 specifically recites:

Based on the source (or destination) point, the application's program may obtain all of the corresponding destinations (or sources) and determine the corresponding link types. (Emphasis added)

Further, page 5, lines 35-37 specifically recites:

In order to create a link, the link type should be defined by name, for example "is parent of", or "is payment of". Permitting a user to name the link types allows the creation of arbitrary relationships based on user defined terminology. (Emphasis added)

Thus in Chakravarty, the user defines link types, and the corresponding link types are determined based on source (or destination) point.

It is respectfully submitted that Corston-Oliver, Chakravarty

and combination thereof, do not disclose or suggest the present invention as recited in independent claim 1, and similarly recited in independent claims 11-13 which, amongst other patentable elements recites (illustrative emphasis provided):

analysis means (16) for analyzing the content of the input document (D1) as regards a content-based relation between the input document (D1) and the reference data (D2),

selection means for selecting a type of linkage from a number of predefined types of linkages, a type of linkage being selected that corresponds to the type of content-based relation between the input document (D1) and the reference data (D2).


Analyzing content of a document as regards a content-based relation between the analyzed document and a reference data, and selecting the linkage type from predefined linkage types, where the selected linkage type corresponds to the type of content-based relation between the analyzed document and the reference data are nowhere disclosed or suggested in Corston-Oliver and Chakravarty, alone or in combination. Rather, the Chakravarty link types are determined based on a source (or destination) point. McKeown is cited to allegedly show other features and does not remedy the deficiencies in Corston-Oliver and Chakravarty.

Based on the foregoing, it is respectfully submitted that independent claims 1, 11, 12 and 13 are patentable over Tokito, Austin, Weaver, Morii, Yamazaki, Campos and combinations thereof, and notice to this effect is earnestly solicited. Claims 2-10 respectively depend from claim 1 and accordingly are allowable for at least this reason as well as for the separately patentable elements contained in each of the claims. Accordingly, separate consideration of each of the dependent claims is respectfully requested.

In addition, Applicant denies any statement, position or averment of the Examiner that is not specifically addressed by the foregoing argument and response. Any rejections and/or points of argument not addressed would appear to be moot in view of the presented remarks. However, the Applicant reserves the right to submit further arguments in support of the above stated position, should that become necessary. No arguments are waived and none of the Examiner's statements are conceded.

In view of the above, it is respectfully submitted that the present application is in condition for allowance, and a Notice of Allowance is earnestly solicited.

Respectfully submitted,

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